



ROTHSTEIN LAW FIRM, PA

David E. Rothstein
Certified Specialist in Employment and Labor Law
Also licensed in North Carolina
drothstein@rothsteinlawfirm.com

Michael G. Corley
mcorley@rothsteinlawfirm.com

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VIA E-MAIL (kathy.helms@ogletreedeakins.com)

AND U.S. MAIL

Kathy Dudley Helms, Esq.
Ogletree Deakins Nash Smoak & Stewart, PC
1320 Main Street, Suite 600
Columbia, SC 29201-3266

Re: Irani v. Palmetto Health et al.,
C/A No. 3:14-cv-03577-CMC-KDW

Dear Kathy:

Enclosed please find Plaintiff's Responses to Defendant Palmetto Health's First Requests for Production in the above-referenced case. Many of these responses incorporate documents already produced in connection with the USC Defendants First Requests for Production, which documents were Bates labeled Irani000001-002210.

I am producing documents with Bates labels Irani002211-003592. The new set of documents contains the entire exhibit binders that Dr. Irani submitted during the California Medical Board hearing, most of which have already been produced separately. I am also supplementing the events in the California Medical Board case which have occurred subsequent to my initial production. Dr. Irani's income tax returns for 2011 through 2014 are also being produced.

If you have any questions about the enclosed documents, please feel free to call me.

Sincerely yours,

David E. Rothstein

Enclosures

cc: Kathryn Thomas, Esq.